

*forwarded to Plaintiff  
mailed via USPS on 7/9/2023*

TRULINCS 54652509 - PARVIZ, MAHSA - Unit: SET-D-A

FROM: 54652509  
TO: Bundy, Thomas; Parvis, Shamsi  
SUBJECT: 2:23-CV-00755-RSL  
DATE: 07/09/2023 12:13:02 PM

Mahsa Parviz  
P.O. Box 13900  
Seattle, WA 98198  
Defendant

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON



JUL 13 2023

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

BY \_\_\_\_\_ DEPUTY

ANDREW GEORGE WATTERS, | No. 2:23-CV-00755-RSL  
Plaintiff, |

v. | DEFENDANT'S STATUS  
| REPORTS AND DISCOVERY  
| PLAN

MAHSA PARVIZ, |  
Defendant. |

COMES NOW, MAHSA PARVIZ, and files Defendant's Status Report and Discovery Plan in response to the Court's June 12, 2023 Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement (Cr. 11).

1. A STATEMENT OF THE NATURE AND COMPLEXITY OF THE CASE

Plaintiff Andrew Watters' claims of fraud pursuant to various California Penal Code statutes and one federal cause of action are based on his alleged relationship with and legal representation of Defendant Mahsa Parviz, giving rise to federal question and supplemental jurisdiction over his claims. Defendant is willing to consent to the exercise of jurisdiction by this Court so that Plaintiff's claims can be dismissed with prejudice. This case is of moderate complexity (see 4 pages of attachments).

2. A PROPOSED DEADLINE FOR JOINING ADDITIONAL PARTIES

July 21, 2023

3. CASE ASSIGNMENT TO MAGISTRATE JUDGE

None.

4. RELATED CASES

There are several related cases, most of which are pending in other jurisdictions (Cr. 8). Defendant has scheduled a conference call with AUSA Kathrynne Seiden on Thursday, July 13, 2023, and will provide the Court with an Addendum to Defendant's Status Report and Discovery Plan after conferring with the Government if necessary/requested.

5. INITIAL DISCLOSURES

Plaintiff has failed to make timely disclosures under FRCP 26(a)(1).

On May 25, 2023, Defendant gave notice of her responsive pleading (Cr. 8) to Plaintiff via USPS Certified Mail RRR # 7011 1150 0001 9793 8427, tendered counterclaims and served a simple discovery request on Plaintiff, requesting production of any indemnity policies (specifically, his professional liability insurance policy that covers legal malpractice incidents), the insurer's information and policy number. Defendant directed Plaintiff to correspond with attorney Thomas M. Bundy, who is retained and represents Defendant on the related domestic violence restraining order matter in California against Plaintiff Andrew George Watters.

To date, Plaintiff has not attempted to confer with Defendant and has not responded to any of Defendant's filings (Cr. 13 at 2) or requests, although he has managed to find the time to update the "hall of shame" about Defendant and her family on his law firm webpage.

6. FRCP 26(a)(1) DISCLOSURE CHANGES

None.

7. DISCOVERY

Defendant's only discovery request is regarding Plaintiff's professional liability insurance policy. Defendant respectfully requests the Court compels Plaintiff to respond to the discovery request within one week of making this report or within any time-frame the Court deems just.

8. AGREEMENTS

None. Defendant is presently unaware of any potential spoliation concerns and will attempt to inquire and/or send litigation hold notices.

9. ESI

Presently unknown but possible.

10. PROTECTION

Defendant's discovery request does not involve unique or extensive claims of privilege or work product protection. Plaintiff has not propounded any discovery requests on Defendant.

11. PROCEDURES

Defendant requests immediate disclosure of inadvertent dissemination of privileged information be made to privilege-holders (party or non-party) and that a conference take place to resolve the matter without Court involvement, if possible.

12. LIMITATIONS ON DISCOVERY

None.

13. DISCOVERY COMPLETION DATE

July 17, 2023, or sooner if Plaintiff cooperates.

14. CASE RESOLUTION SUGGESTIONS

Defendant may move for summary judgment on the merits to obtain an order of dismissal with prejudice. Defendant's position will be better ascertained on July 17, 2023.

15. ADR

Defendant is willing to submit to the individualized trial program set forth in LCR 39.2, mediation or other alternative dispute resolution processes but Plaintiff does not appear to be amenable.

16. TRIAL

January 2023 or any date convenient for the Court.

17. JURY OR NON-JURY

Non-jury

18. TRIAL DAYS

One.

19. CORPORATE DISCLOSURE STATEMENTS MADE

None.

Date: July 9, 2023

Respectfully submitted,

\_\_\_\_\_/s/ Mahsa Parviz  
MAHSA PARVIZ



Mahsa Parviz  
P.O. Box 13900  
Seattle, WA 98198  
Defendant

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

ANDREW GEORGE WATTERS,  
Plaintiff

No. 2:23-CV-00755-RSL

v.

MAHSA PARVIZ,  
Defendant.

DEFENDANT'S STATUS  
REPORT AND DISCOVERY  
PLAN



JUL 13 2023

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Defendant's Status Report and Discovery Plan

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